

EXHIBIT 25

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DREW J. RIBAR, Pro Se Plaintiff
3480 Pershing Ln
Washoe Valley, NV 89704
(775) 223-7899
Const2Audit@gmail.com

vs.

WASHOE COUNTY, et al.

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

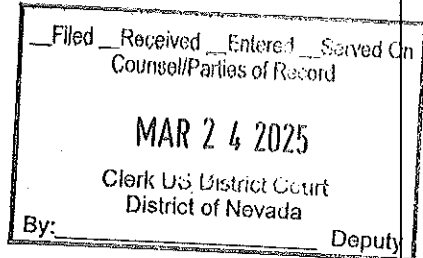


EXHIBIT 25

Title: YouTube Privacy Complaint Against Plaintiff – Retaliation for Public Documentation

Date: August 24, 2024

Source: Email from YouTube Legal Support Team to Plaintiff (Const2Audit@gmail.com)

Bates Number Range: EXH278

Description:

PLEADING TITLE - 1

1 This exhibit contains an email from YouTube's Legal Support Team notifying Plaintiff of a
2 **privacy complaint** against a video posted on his YouTube channel, *Auditing Reno 911*.
3

4 **Key details include:**

5
6 **1. Notification of Privacy Complaint Related to Public Video**

- 7 ○ YouTube confirmed receipt of a privacy complaint from an individual regarding
8 Plaintiff's video, posted at:
9 https://www.youtube.com/watch?v=7-NNy9zjQ_Q
10 ○ The complaint targets timestamps from **0:45 to 3:00** in the video.
11 ○ YouTube did not immediately restrict or remove the video but provided **48 hours**
12 **for Plaintiff to respond** before further review.
13

14 **2. Potential Retaliation by Washoe County or Related Defendants**

- 15 ○ The **timing** of the complaint suggests it may have been filed in **retaliation** for
16 Plaintiff's lawful documentation of government activities.
17 ○ The video contains evidence of **potential First and Fourteenth Amendment**
18 **violations** by Washoe County Library officials, law enforcement, and private
19 entities acting under color of law.
20

21 **3. YouTube Provides Option to Blur or Edit Content**

- 22 ○ The email **encourages** Plaintiff to edit or remove the alleged private information
23 using YouTube's Custom Blurring tool.
24 ○ Plaintiff asserts that the video **does not violate privacy laws** because it was
25 filmed in a **public forum** and contains **matters of public concern**.
26

27 **4. YouTube Privacy Guidelines and First Amendment Implications**
28

- 1 o The email states:

2
3 *"We're committed to protecting our users, and we hope you understand*
4 *the importance of respecting others' privacy. When uploading videos in*
5 *the future, please remember not to post someone's personal information*
6 *without their consent."*
7

- 8 o Plaintiff **has not published private information** beyond what was captured in a
9 **public setting.**
10
11 o If Washoe County or an affiliated party filed this complaint, it **constitutes an**
12 **attempt to suppress public information**, violating First Amendment protections
13 under **Nieves v. Bartlett, 587 U.S. 391 (2019).**
14

15
16
17 **Relevance to Case:**

18
19 **Supports First Amendment Retaliation Claim**

- 20 • Demonstrates that a **government-affiliated entity** (or individual acting on its behalf)
21 attempted to suppress content **documenting government actions.**
22
23 • Shows an effort to **limit Plaintiff's ability to publish information** critical of Washoe
24 County Library officials and law enforcement.
25
26 • Supports claims of **unconstitutional retaliation for protected speech** under 42 U.S.C. §
27 **1983.**
28

Refutes BOC's Motion to Dismiss – Demonstrates Coordination with Government

- If the complaint was filed by a **BOC representative** or someone acting under Washoe County's direction, it establishes **joint action** between **BOC** and **Washoe County Library System**.
- Supports Plaintiff's argument that BOC is a **state actor** under **Lugar v. Edmondson Oil Co., 457 U.S. 922 (1982)**.

Relevant to Monell Liability – Government Suppression of Public Information

- Demonstrates that **Washoe County officials** or affiliates engaged in a **systemic effort to suppress Plaintiff's ability to document and share government activities**.
- Strengthens **Monell liability** claims by showing a **pattern of retaliation** against those who challenge Washoe County's policies.

CERTIFICATION OF AUTHENTICITY

I, **Drew J. Ribar**, hereby certify that this exhibit is a **true and correct copy** of the original document received from **YouTube's Legal Support Team** regarding the privacy complaint filed against my YouTube channel. I further certify that this document is submitted as evidence in **support of Plaintiff's claims** in this matter.

Dated: March 17, 2025

/s/ **Drew J. Ribar**

PLEADING TITLE - 4

1 **Drew J. Ribar, Pro Se**

2 3480 Pershing Ln

3 Washoe Valley, NV 89704

4 (775) 223-7899

5 Const2Audit@gmail.com

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PLEADING TITLE - 5

1/13/25, 9:00 PM

Gmail - Re: Case Subject



Const2Audit <const2audit@gmail.com>

Re: Case Subject

1 message

YouTube Support Team <privacy+02v39pzj893jd02@support.youtube.com>

Sat, Aug 24, 2024 at
6:42 PM

Reply-To: YouTube Support Team <privacy+02v39pzj893jd02@support.youtube.com>

To: const2audit@gmail.com

Hi Auditing Reno 911,

This is to notify you that we have received a privacy complaint from an individual regarding your content:

https://www.youtube.com/watch?v=7-NNy9zjQ_Q

The information reported as violating privacy is at 0_45-3_00

Please note that the violation may also occur in the title, video description, channel image or background.

We would like to give you an opportunity to remove or edit the private information that might be present within the content reported. This notification informs you that another user has raised a privacy concern about your content, however, **it will not automatically result in your video(s) being restricted, and no associated penalty has been applied to your video at this time.** We would like to give you an opportunity to remove or edit the private information that might be present within the content reported. After 48 hours of this notice, we will review the complaint for violations of our Privacy Guidelines and consider restricting the content.

Please note that you may not need to remove the content entirely in order to resolve the issue. YouTube offers a Custom Blurring tool, which allows you to blur anything in your video, including individuals or information. For more information on the blurring feature, visit this [Help Center](#) article. Please also check the title, description, video tags, channel image or background for relevant personal information. YouTube offers metadata editing tools which you can access by going to My Videos and clicking the Edit button on the reported video.

We're committed to protecting our users, and we hope you understand the importance of respecting others' privacy. When uploading videos in the future, please remember not to post someone's personal information without their consent. For more information, please review our Privacy Guidelines.

Sincerely,

The YouTube Legal Support Team

EXH 278